

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13 NO:

**RICHARD CORLEY
ROSA CORLEY**

14-00378-NPO

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND FOR ABANDONMENT OR
ALTERNATIVELY, FOR ADEQUATE PROTECTION**

COMES NOW Richard and Rosa Corley (collectively referred to as "Debtor"), by and through undersigned counsel, and files this Response to the Motion to Lift Automatic Stay (Dkt#54) filed by Wells Fargo Bank, N.A. In support of this motion, Debtor states as follows:

1. Debtor affirms the averments alleged in paragraph 1 of Creditor's motion.
2. Debtor affirms the averments alleged in paragraph 2 of Creditor's motion.
3. Debtor affirms the averments alleged in paragraph 3 of Creditor's motion.
4. Debtor affirms the averments alleged in paragraph 4 of Creditor's motion.
5. Debtor denies the averments alleged in paragraph 5 of Creditor's motion. Debtor disputes the alleged delinquency.
6. Debtor affirms the averments alleged in paragraph 6 of Creditor's motion.
7. Debtor denies the averments together with the requested relief alleged in paragraph 7 of Creditor's motion.
8. Debtor requests for Creditor's requested relief in the *ad damnum* clause to be denied.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that upon notice and hearing that this Court enter its order denying the motion and for such other relief to which the Debtor and this bankruptcy estate may be entitled.

Dated: March 15, 2018

Respectfully submitted,
Richard Corley
Rosa Corley

By: /s/ Robert Rex McRaney, Jr.
Robert Rex McRaney, Jr.

Prepared by:
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CERTIFICATE OF SERVICE

I, the undersigned attorney for the Debtor, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Trustee, the United States Trustee, and other parties in interest, if any, as identified below.

Attorney for Creditor
Elizabeth Crowell

Chapter 13 Trustee
Harold J Barkley, Jr.

United States Trustee

Dated: March 15, 2018

/s/ Robert Rex McRaney, Jr.
Robert Rex McRaney, Jr.